

REMARKS

The Office Action dated November 23, 2007, has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1, 11, and 15-28 have been amended to more particularly point out and distinctly claim the subject matter of the invention. Claims 1-27 are respectfully submitted for consideration.

Claim 11 was rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter. Specifically, claim 11 was rejected due to a typographical error. In response, claim 11 has been amended to replace the word “multime” with “multimedia subsystem.” As such, it is respectfully requested that the rejection of claim 11 be withdrawn.

Claims 1-28 were rejected under 35 U.S.C. 103(a) as being unpatentable over 3GPP TS 33.102 v5.1.0 (3G Security) in view of U.S. Patent No. 7,219,223 to Bacchus et al. (Bacchus) and further in view of UMTS Security. The Office Action took the position that 3G Security and Bacchus describe all of the features of claims 1-28. This rejection is respectfully traversed.

Applicants respectfully submit that the Office Action’s mapping of steps in claim 1 to steps in Fig. 14 of 3G Security is erroneous. In 3G Security, step 2 might be considered to correspond to a request (not admitted). The Office Action then appears to have suggested that the step of determining can be based on information stored in an

SRNC at step 1. However, claim 1 specifies that the step of determining is “based on the information, in the second controller that the user equipment supports a second security mechanism other than a first security mechanism.” The word “the” refers back to information received in the request.

The Office Action also suggested that 3G Security describes including in the request an indication that the second security mechanism is used by the user equipment. However, such an interpretation is not correct, given that the Office Action has earlier suggested that step 2 in Fig. 14 corresponds to the request in claim 1 - step 11 is an entirely separate message to step 2, and therefore what is sent in step 11 cannot be said to be “included” in what is sent in step 2.

As the Office Action conceded, 3G Security does not disclose “receiving a request for registration” (that is, “sending a request for registration” in former claim 1).

Accordingly, 3G Security does not disclose or suggest, at least “receiving a request for registration from a user equipment at a second controller, said request for registration including information indicative of at least one security mechanism supported by the user equipment; determining, based on the information, in the second controller that the user equipment supports a second security mechanism other than a first security mechanism; removing the information from the request for registration in the second controller, including in the request for registration an indication that the second security mechanism is used by the user equipment and forwarding the request for registration

including said indication to a serving controller", as recited by claim 1 and similarly recited in claim 15

Bacchus generally describes a client that transmits its cipher suite list to the load balancer. A cipher suite match is then determined based on that list and a mapping of cipher suite names to services (column 9 lines 24 to 33). A new SSL connection is then established using the encryption capabilities associated with the cipher suite match to allow the client to receive data in encrypted form.

UMTS Security discloses an IMS subsystem using SIP. Fig. 7 of UMTS Security shows illustratively message flow for a registration request from a user equipment to a S-CSCF.

Neither of the cited secondary references discloses or suggests the features necessary for their combination with 3G security to lead to the method of claim 1.

Furthermore, none of the cited references discloses or suggests the problems that use of the claimed invention overcomes. For example, none overcomes the problem that if a request for registration does not include a list containing an indication that a default security mechanism such as 3GPP IPSec is supported, registration with a serving controller will not be allowed to proceed. Certain embodiments of the present invention are advantageous in that they enable a user equipment not supporting such a default security mechanism to register to the serving controller (page 20 lines 1-5 of the present application). Such embodiments also allow each request by such a user equipment to be authenticated by the serving controller, thereby addressing a problem of lack of integrity

protection between a second controller such as a P-CSCF and the user equipment (page 17 lines 4-6 of the present application) in the event that the default security mechanism is not supported. Thus, the claims are non-obvious based on these secondary considerations of non-obviousness.

In view of the above, Applicants respectfully submit that 3G Security, Bacchus, and UMTS Security, individually or in combination, fail to disclose or suggest all of the features of claims 1, 15, and 24. Thus, it is respectfully requested that the rejection to claims 1, 15, and 24 be withdrawn.

Claims 2-14, 16-23, and 25-28 are dependent upon claims 1, 15, and 24. Claims 2-14, 16-23, and 25-28 should be allowed for at least their dependence upon claims 1, 15, and 24, and for the specific limitations recited therein.

For the reasons explained above, it is respectfully submitted that each of claims 1-28 recites subject matter that is neither disclosed nor suggested in the cited art. Also, it is respectfully submitted that the subject matter is more than sufficient to render the claimed invention unobvious to a person of ordinary skill in the art. It is, therefore, respectfully requested that all of claims 1-28 be allowed, and that this application be passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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Enclosures: Petition for Extension of Time
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